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By ECF

Hon. Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 6G North

Re: *Edmondson, et al. v. Raniere, et al.*, 1:20-CV-00485-EK-CLP

Dear Judge Komitee:

Pursuant to this Court's Individual Practices and Rules Section III.D.2, Defendant Clare Bronfman submits this letter motion seeking leave to file a memorandum of law in excess of 35 pages in support of her motion to dismiss. In support of her motion she states as follows:

On November 30, 2021, this Court entered a minute order providing for a 35-page limit for each Defendant's opening brief in support of their respective motions to dismiss.

The First Amended Complaint is 217 pages. Various subsets of 75 Plaintiffs bring 16 unique claims against various subsets of 15 defendants. Given these complexities, Clare Bronfman requests an additional 10 pages (for a total of **45 pages**) to respond to these issues in her memorandum. An additional 10 pages would allow Clare Bronfman to provide a more organized framework for her brief and permit a more complete discussion of the legal issues at hand.

This request is submitted four business days prior to the scheduled deadline because counsel for Clare Bronfman was unable to discuss this request with her before today because of various prison COVID restrictions. Counsel appearing for Plaintiffs and Defendant Sara Bronfman consent to Clare Bronfman's request for additional pages.

Respectfully,

WILLKIE FARR & GALLAGHER LLP

/s/ Craig C. Martin
Craig C. Martin

Cc: All Counsel by ECF